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January 20, 2022

VIA ECF

Honorable Debra Freeman
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

SO ORDERED



DEBRA FREEMAN
United States Magistrate Judge

Dated: 1/20/2022

Re: *Vanderhorst v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-09921-DCF

Dear Judge Freeman,

We write on behalf of plaintiff, Julia Vanderhorst on behalf of Minor Child SJAV, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion currently is due on January 24, 2022. Plaintiff respectfully requests an extension of time up to and including March 10, 2022. This is plaintiff's third request for an extension. This request is necessitated by the twelve briefs due to be filed by our office within the next two weeks.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. Plaintiff to file her motion for judgment on the pleadings on or before **March 10, 2022**;
- b. Defendant to file its response/cross-motion on or before **May 9, 2022**; and

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c. Plaintiff to file her reply (if any) on or before **May 30, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Shira Siskind, Esq. (by ECF)